

WTS Contracting Corp.

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06-December-2019

Attn: Clerk of the Court
United States Bankruptcy Court
Southern District of New York
300 Quarropas Street
White Plain, N.Y. 10601

In the Matter of: Chapter 11
Case No. 18-23538 (RDD)
Document No. 6029

SEARS HOLDINGS CORPORATION, *et al* - Debtors

WTS CONTRACTING CORP (19-08639), Defendant

To the Honorable Robert D. Drain:

This notice shall serve as official notice of **Objection** (due December 6, 2019) by the Defendant, WTS Contracting Corp, to the Motion for *an Order Establishing Streamlined Procedures Governing Adversary Proceeding Brought by the Debtors, Pursuant to sections 502,547, 548, 550 of the Bankruptcy Code.*

The Proposed Procedures to govern adversary proceedings brought by one or more of the Debtors to avoid transfers and or disallow claims, pursuant to sections 502, 547, 548 and 550 of the Bankruptcy Code identified on schedule **Exhibit A**, (the “**Avoidance Action**”).

WTS Contracting Corp respectfully requests the Honorable Court acknowledge and enter onto the record, the following: WTS Contracting Corp entirely objects to: 1) the Motion stated above; 2) to the proposed Hearing Date of December 13, 2019, 10:00am; 3) WTS

Contracting Corp entirely rejects the Avoidance Action and will answer the Summons with respect to the Avoidance Action served upon us, within the timeframe allotted of 30 days from November 20, 2019.

WTS Contracting Corp are objecting to this Motion because we received the Summons related to the "Avoidance Action" On December 3, 2019, via regular US Postal Service mail delivery, and we will respond to the Summons within the 35 days from November 20, 2019 - which we expect is approximately December 29, 2019. A hearing date on this matter as currently schedule as December 13, 2019 is *before* December 29, 2019 and, therefore, we believe it to be unfair to have a hearing before the opportunity to respond to the adversarial Summons.

Respectfully,

WTS Contracting Corp.
Acting as Pro-Se